



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

October 14, 2020

Mr. Paul Lake
Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276

**Re: Transfer of Operation and Maintenance (O&M) Responsibilities
Jennison-Wright Corporation Superfund Site
Granite City, IL**

Dear Mr. Lake:

This letter serves to document the transfer of responsibility that took place as of September 29, 2020, for the CERCLA groundwater restoration remedy (OU3) at the Jennison-Wright Corporation (Jennison-Wright) site in Granite City, Illinois. Although you received an advance notification letter in April 2020, this letter is to officially document the transfer of responsibility. The paragraphs below reiterate the information included in the April 2020 letter.

Transfer of Responsibility Beginning September 29, 2020

The National Contingency Plan, 40 CFR §300.435(f)(3), states:

[F]or fund-financed remedial actions involving treatment or other measures to restore groundwater or surface water quality to a level that assures protection of human health and the environment, the operation of such treatment or other measures for a period of up to ten years after the remedy becomes operational and functional will be considered part of the remedial action. Activities required to maintain the effectiveness of such treatment or measures following the ten-year period, or after the remedial action is complete, whichever is earlier, shall be considered [operation and maintenance (O&M)].

Over the past ten years, Illinois EPA has operated the remedy at the Jennison-Wright site with funds obligated under the Jennison-Wright Superfund Cooperative Agreement V-96548001, originally awarded on October 1, 2004. The long-term response action (LTRA) period related to

the groundwater remedy ended on September 28, 2020. Therefore, as required by CERCLA §104(c)(3), site responsibility was transferred from U.S. Environmental Protection Agency (EPA) to Illinois EPA beginning on September 29, 2020. As of that date, the State assumed O&M activities at the Jennison-Wright site and will be responsible for implementing O&M until cleanup levels have been achieved.

As of the end of the LTRA period, EPA no longer has an interest in CERCLA-funded equipment that is considered an integral part of services to individuals, as per 40 CFR §§35.6325 and 35.6815. Pursuant to CERCLA §104(j)(2), as of September 29, 2020, Illinois EPA must accept transfer of any property interest that was originally acquired by EPA to conduct the remedial action. Subsequent disposal of such property by Illinois EPA must be made in accordance with 40 CFR §35.6815(b)(5). If Illinois EPA acquired property using federal money in order to conduct the remedial action, as has been the case at the Jennison-Wright site, disposition of the property must be made in accordance with applicable regulations in 40 CFR §35 Subpart O and the NCP.

If you have any questions, please contact my staff, Mary Tierney, Remedial Project Manager, EPA, at (312) 886-4785 or tierney.mary@epa.gov.

Sincerely,

X 

Timothy J. Fischer, Chief
Remedial Response Branch 2
Signed by: TIMOTHY FISCHER

cc: Christopher Hill, Illinois EPA (via email only)
Brian Conrath, Illinois EPA (via email only)
Demaree Collier, U.S. EPA (via email only)
Richard Clarizio, U.S. EPA (via email only)
Richard Hackley, U.S. EPA (via email only)
Cynthia Mack-Smeltzer, U.S. EPA (via email only)
Denise Boone, U.S. EPA (via email only)
Mary Tierney, U.S. EPA (via email only)
Superfund Records Center